

## Frequently Asked Questions

### What is a NESHAP?

A National Emission Standard for Hazardous Air Pollutants, or NESHAP, is a federal regulation that targets air emissions of hazardous air pollutants (HAP).

### What is an area source?

An area source is any facility that uses HAP and emits to the air less than 10 tons per year of any single HAP and less than 25 tons per year of all HAP.

*Note: There are separate NESHAP for major sources that produce or fabricate flexible polyurethane foam.*

### What chemicals are HAPs?

The Clean Air Act contains a list of 188 chemicals that are officially classified as HAP. Common HAP used by flexible polyurethane production and fabrication facilities are methylene chloride, TDI, and MDI.

*Note: This rule only addresses emissions of methylene chloride.*

## For More Information

The Flexible Polyurethane Foam Production and Fabrication NESHAP was published in the Federal Register on July 16, 2007 (72 FR 38864). The notice is available at [www.epa.gov/ttn/atw/area/fr16jy07.pdf](http://www.epa.gov/ttn/atw/area/fr16jy07.pdf)

### Contact your regional EPA Office:

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I	CT, MA, ME, NH, RI, VT	617-918-1650
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[www.epa.gov/ttn/atw/area/fr16jy07.pdf](http://www.epa.gov/ttn/atw/area/fr16jy07.pdf)

Office of Air Quality Planning and Standards

## Summary of Regulations Controlling Air Emissions for the Flexible Polyurethane Foam Production and Fabrication Industry



**National Emission Standards for Hazardous Air Pollutants (NESHAP)**

**Subpart OOOOOO**

# Flexible Polyurethane Foam Production and Fabrication Area Source NESHAP

On July 16, 2007, EPA finalized a regulation that affects all flexible polyurethane foam production and fabrication facilities that are area sources. This brochure is intended to provide basic information for foam producers and fabricators that may be subject to this rule.

## **Foam Fabrication**

### **Methylene Chloride Use is PROHIBITED**

#### **Requirements:**

- ⇒ The use of adhesives containing methylene chloride is prohibited.

#### **Compliance Date:**

- ⇒ July 16, 2007.

#### **Reporting and Recordkeeping:**

- ⇒ There are no reports required.
- ⇒ Keep a compliance certification dated no later than July 16, 2007 on file that certifies that you do not use adhesives containing methylene chloride (Facilities with loop slitters only).
- ⇒ Keep records to demonstrate you are not using adhesives containing methylene chloride (All facilities).

## **Slabstock Foam Production**

### **Methylene Chloride NOT used as an ABA**

#### **Requirements:**

- ⇒ Do not use methylene chloride as an ABA or otherwise.

#### **Compliance Date:**

- ⇒ July 16, 2008.

#### **Reporting and Recordkeeping:**

- ⇒ Notification of Compliance Status Report—Due January 12, 2009; certifying that you do not use methylene chloride as an ABA or otherwise.
- ⇒ Records to demonstrate you are not using methylene chloride as an ABA or otherwise.

## **Slabstock Foam Production**

### **Methylene Chloride Used as an Auxiliary Blowing Agent (ABA)**

#### **Requirements:**

- ⇒ Controls required for methylene chloride storage tanks.
- ⇒ Inspections and repairs required for pumps, valves, and other equipment in methylene chloride service.
- ⇒ Allowable methylene chloride usage as an ABA calculated based on grades of foam produced and production levels.
- ⇒ Facility-wide compliance option allows simplified compliance by monitoring methylene chloride usage at the storage tank(s).

#### **Compliance Date:**

- ⇒ July 17, 2008.

#### **Reporting and Recordkeeping:**

##### **Reports -**

- ⇒ Initial notification — Due November 13, 2007.
- ⇒ Precompliance Report—Due July 16, 2007.
- ⇒ Notification of Compliance Status Report—Due January 12, 2009.
- ⇒ Semiannual Reports—Due September 9, 2009 and every six months thereafter.
- ⇒ Annual Compliance Certifications.

##### **Records -**

- ⇒ Foam production
- ⇒ Polyol usage
- ⇒ Methylene chloride usage
- ⇒ Inspection and repairs
- ⇒ Tank levels (Facility-wide option).

## **Molded and Rebonded Foam Production**

### **Methylene Chloride Use is PROHIBITED**

#### **Requirements:**

Methylene chloride is prohibited from the following uses:

- ⇒ Equipment Cleaning
- ⇒ Mixhead Flushing
- ⇒ Mold Release Agent

#### **Compliance Date:**

- ⇒ July 16, 2007.

#### **Reporting and Recordkeeping:**

- ⇒ There are no reports required.
- ⇒ Keep a compliance certification dated no later than July 16, 2007 on file that certifies that you do not use equipment cleaners, mixhead flushing products, and mold release agents containing methylene chloride.
- ⇒ Records to demonstrate you are not using methylene chloride as an ABA or otherwise.